

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF OKLAHOMA

FILED

JUL 12 2022

CARMELITA REEDER SHINN, CLERK
U.S. DIST. COURT, WESTERN DIST. OKLA.
BY _____ DEPUTY

PATRICIA THOMPSON, as PERSONAL
REPRESENTATIVE of the ESTATE of
MARCONIA LYNN KESSEE, deceased,

Plaintiff,

v.

Case No. CIV-19-113-SLP

NORMAN REGIONAL HOSPITAL
AUTHORITY d/b/a NORMAN REGIONAL
HOSPITAL, a public trust, et al.,

Defendants.

**PATRICIA THOMPSON'S MOTION FOR RELIEF FROM ORDER
FILED JULY 7, 2022 ORDER SUBSTITUTING HER AS THE PLAINTIFF
IN THE ABOVE MATTER REPLACING HER WITH BRITTANY REID**

COMES NOW Plaintiff, Patricia Thompson, pro se, pursuant to Rule 60(b) of the Fed. R. Civ. P., moves the Court grant her relief from the July 7, 2022 Order removing her as the Plaintiff in the above styled cause and substituting her with Brittani Reid and as set forth below:

1. The matter was filed by Plaintiff Patricia Thompson who was appointed personal representative of the Estate of Marconia Lynn Kessee, on October 15, 2018.
2. On June 16, 2022, the Honorable Judge Allen Welch ordered that Patricia Thompson be removed as personal representative and authorized Brittany Reid to be appointed as successor personal representative of the Estate.
3. On June 16, 2022, Letters of Administration were issued to Brittany Reid.
4. On June 28, 2022, unbeknownst to Plaintiff Patricia Thompson Laird Hammons Laird the law firm Plaintiff hired to represent her on behalf of the Estate filed a "Motion to Substitute" calling for Plaintiff to be replaced by Brittany Reid as the successor Plaintiff in the matter.
5. That Plaintiff hired the law firm of Laird Hammons Laird to file the lawsuit in the District Court of

Oklahoma County, however, the lawsuit was removed to the federal court.

6. That Plaintiff was never notified of the filing of the motion to substitute until my son Michael Washington discovered the motion to substitute had been filed in the office of the court clerk.

7. That Jason Hicks nor the law firm of Laird Hammons Laird had the authority to resubmit the June 28, 2022 motion to substitute because the law firm and attorneys had been fired by her on June 28, 2022. See attached notice.

8. That said motion to substitute was filed by the attorneys without her prior consent or prior knowledge.

9. That the filing of the motion to substitute by the attorney Jason Hicks and law firm of Laird Hammons Laird was a betrayal of the worse kind and unquestionably violated the attorney's and firm's code of professional conduct.

10. That the filing of the motion shows a blatant and intractable disregard for the confidentiality the attorneys and law firm owed to Plaintiff while representing Plaintiff in the civil right lawsuit.

The behavior of Jason Hicks and the law firm of Laird Hammons Laird was totally immoral, unethical and served to deprive Plaintiff of her fundamental right to due process. What the firm and attorneys did was commit a flagrant and deliberate conflict of interest by filing the motion to substitute on behalf of Ms. Reid. What's more, attorney Jason Hicks made the Court aware that Ms. Reid had hired counsel to protect whatever interest in the lawsuit she thought she might have. See [Doc. Nos 392-395].

Rule 60(b) of the Fed. R. Civ. P. permits a party to move for relief from final judgement or order, or proceeding under Federal Rule of Civil Procedure (FRCP). This rule enables a party or its representative to seek substantive corrections or altercations in final judgment, order or proceeding.

The behavior of Jason Hicks and the law firm of Laird Hammonds Laird in its representation of Plaintiff Patricia Thompson is a sham and mockery of justice and amount to a gross miscarriage of justice. This pleading was irresponsible and unethical. These attorneys took an oath to uphold certain ethics. Their behavior breached their code ethics. Among their illegal and wrongful actions was breaking attorney-client privilege, conflict of interest, and betraying their client's trust.

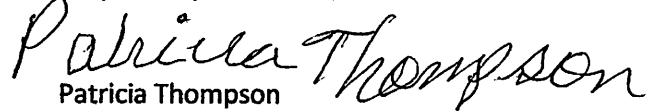
This Court has just learned how the law firm of Laird Hammonds Laird went behind the back of Patricia Thompson whom it represented in this federal civil rights lawsuit prior to them being fired by Plaintiff and signed away her right to serve as the Plaintiff in this lawsuit. The attorneys jumped ship in the middle of stream and filed a pleading "Motion to Substitute" Plaintiff in favor of Brittany Reid and without informing Plaintiff that it had been filed. This was without question a conflict of interest on part of the attorneys and law firm that violated Plaintiff's fundamental right to due process. It was also a blatant and intractable betrayal of the worse kind.

Finally, the Court overlooked the fact that prior to the Court's July 7, 2022 Order, Plaintiff fired the law firm of Laird Hammonds Laird and the attorneys involved in this civil matter. See [Doc. No. 396]. At that point of their firing the attorneys should have filed their motion to withdraw. However, greed and thirst for money prevented them from doing so. In case this Court missed the "Notice" that the attorneys had been fired it is now being brought to the Court's attention. Consequently, the Court had no subject matter jurisdiction to enter the ruling substituting Plaintiff for Brittany Reid in this lawsuit. And the ruling on the motion was a complete abuse of discretion.

The Court has no authority to disregard Plaintiff's wishes to fire the attorneys. That is a fundamental right she has.

WHEREFORE, premises considered, Plaintiff Patricia Thompson requests that the Court grant her relief from its July 7, 2022 Order substituting Brittany Reid as the Plaintiff in this lawsuit and that she be reinstated to that position.

Respectfully submitted,



Patricia Thompson
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CERTIFICATE OF MAILING

On this 12, day of July, 2022, a true and correct copy of the foregoing was mailed, postage paid, to:

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Patricia Thompson